Hearing Date: April 28, 2009 at 10:00 a.m. Objection Deadline: April 21, 2009

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

IN RE: Case No. 08-35653-KRH

CIRCUIT CITY STORES, INC., et al., Chapter 11 (Jointly administered)

Debtors.

## NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE THAT Ramco West Oaks I, LLC, Ramco JW, LLC, RLV Village Plaza, LP, and RLV Vista Plaza, LP, (each a "Landlord" and collectively "Landlords") has filed with the Court a Motion of Landlord, Ramco West Oaks I, LLC, Ramco JW, LLC, RLV Village Plaza, LP, and RLV Vista Plaza, LP, (each a "Landlord" and collectively "Landlords") for Order Allowing and Compelling Payment of Administrative Expense Claim Under 11 U.S.C. § 503(B) and Post-Petition Lease Obligation Under 11 U.S.C. §365(D)(3) (the "Motion"). A copy of the Motion has been filed with the Court and forwarded to you.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). Under Local Bankruptcy Rule 4001-(a)-1, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing unless you take the following steps:

1. File with the Court, at the address shown below, a written objection. If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before **April 21, 2009 at 5:00 p.m.** 

Paul K. Campsen, Esq. VSB No. 18133 Kaufman & Canoles, a professional corporation 150 West Main Street (23510) Post Office Box 3037

Tele: (757) 624-3000 Fax: (757) 624-3169

Norfolk, VA 23514

Terrance A. Hiller, Esq.
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25800 Northwestern Highway, Suite 950
Southfield, MI 48075

Tele: (248) 357-0000 Fax: (248) 357-7488 William C. Redden, Clerk United States Bankruptcy Court 701 E. Broad Street, Suite 4000 Richmond, VA 23219

You must also deliver a copy to all parties on the Certificate of Service below and to:

Counsel for Circuit City Stores, Inc. Douglas M. Foley, Esq. McGuireWoods LLP 9000 World Trade Center 101 W. Main St. Norfolk, VA 23510

Counsel for Official Committee of Unsecured Creditors Brad R. Godshall, Esq. Pachulski Stang Ziehl & Jones, LLP 10100 Santa Monica blvd, 11th Floor Los Angeles, CA 90067-4100

Co-Counsel for Google, Inc. Paul K. Campsen, Esq. Ann K. Crenshaw, Esq. Kaufman & Canoles 150 W. Main Street, Suite 2100 Norfolk, VA 23510

David M. Blau, Esq. Kupelian Ormond & Magy, P.C. 25800 Northwestern Highway, Suite 950 Southfield, MI 48075

2. Attend the hearing scheduled for **April 28, 2009 at 10:00 a.m.** before the Honorable Kevin R. Huennekens, U.S. Bankruptcy Court, Room 5000, United States Courthouse, 701 E. Broad Street, Richmond, Virginia 23219.

If you or your attorneys do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing.

Dated: April 8, 2009.

RAMCO WEST OAKS I, LLC, RAMCO JW, LLC, RLV VILLAGE PLAZA, LP, AND RLV VISTA PLAZA, LP,

By: /s/ Paul K. Campsen

Paul K. Campsen, Esq. VSB No. 18133 Kaufman & Canoles, a professional corporation 150 West Main Street, Suite 2100 Norfolk, VA 23510 Tele: (757) 624-3000

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Southfield, MI 48075
Tele: (248) 357-0000

Co-Counsel for Ramco West Oaks I, LLC, Ramco JW, LLC, RLV Village Plaza, LP, and RLV Vista Plaza, LP,

## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Notice of Motion and Hearing was sent on this 8th day of April, 2009, to all creditors and parties-in-interest who are included in the United States Bankruptcy Court's ECF e-mail notification system.

_/s/ Paul K. Cam	psen

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